



Alumax Inc.
5655 Peachtree Parkway
Norcross, Georgia 30092-2812
404/246-6600
FAX 404/246-6660
Direct Dial: 404/246-6638

October 30, 1995

VIA AIRBORNE

Joseph Cosentino, OSC
Removal Action Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue
Edison, NJ 08837

Re: Request for Information Pursuant to Section 104(e) of CERCLA , 42 U.S.C. Section 9604(e); Bayonne Barrel & Drum, Superfund Site, 150-154 Raymond Boulevard, Newark, Essex County, New Jersey

Our File # 1.500.98

Dear Sirs:

Alumax Mill Products, Inc. ("Alumax") is in receipt of Kathleen C. Callahan's letter dated September 28, 1995, attaching the Request for Information referenced above. The Request for Information was addressed to "Howmet Corporation" at a facility now owned by Alumax in Lancaster, Pennsylvania. Alumax purchased this facility from Howmet in 1982. Therefore, we are handling this matter as successor to Howmet.

ALUMAX'S INVESTIGATION

Alumax has undertaken a search for information requested regarding the Bayonne Barrel & Drum site ("Site"). The information contained in this letter is not within the personal knowledge of the undersigned counsel, but was gathered by persons working under the direction of Alumax Law Department. Moreover, Alumax reserves the right to supplement these responses if new information is discovered. Because of limited manpower and the volume of information which conceivably falls within the Section 104 request, Alumax cannot be certain that it has uncovered all relevant information.

In its investigation, Alumax interviewed knowledgeable employees and reviewed numerous documents. EPA's contractor TRC has provided us with copies of documents which show a number of shipments of empty drums to the Site. Alumax has searched its records, but has not found any documents in addition to those already in the possession of TRC.

466932



**Bayonne Site 104(e) Response
October 27, 1995**

Our response to the numbered requests is as follows:

- 1(a). Alumax Mill Products, Inc. as successor to Howmet Corporation.**
- 1(b). Delaware corporation.**
- 1(c). None known.**
- 1(d). Alumax Mill Products is a wholly-owned subsidiary of Alumax Inc., a Delaware corporation. Alumax Inc. headquarters are located at:**

**Alumax Inc.
5655 Peachtree Parkway
Norcross, Georgia 30092-2812**

Mr. Alan Born is Chairman of the Board and Chief Executive Officer of Alumax Inc. He maintains an office at the above headquarters address.

- 1(e). The Request for Information was directed to Howmet Corporation at a site currently owned by Alumax Mill Products, Inc.**
- 1(f). N/A**
- 2(a). The documents provided by TRC (since TRC has these documents, we do not reproduce them here) show a total of 3,065 empty drums being sent to the Site between 1/17/80 and 6/26/80. Alumax research to date does not contradict the information contained in the documents.**
- 3. The Site was an authorized drum reconditioning agent for several entities which supplied materials to Howmet in drums, including Mobil and Lilly Industrial Coatings. Howmet practice in the late 1970's to the early 1980's was to ship empty drums to a single reconditioner based on a competitive bid which covered a six-month period. It appears that the Site was the designated shipment point for all drums in the first six months of 1980. Although Howmet obviously had an economic incentive to completely drain the drums of their valuable contents before shipping them to the Site, it is possible that the drums may have contained trace amounts of paint, paint solvent, or used rolling oils.**
- 4. Bradford F. Whitman, Esq.
Reed Smith Shaw & McClay
Philadelphia, Pennsylvania
(research of facility records)**

Bayonne Site 104(e) Response
October 27, 1995

David Dilts
Alumax Mill Products - Environmental
(research of facility records)

John Hatch
Alumax Mill Products - Purchasing
(research of facility records and interview)

5. Our records indicate that the following insurance was in effect for the Lancaster, Pennsylvania facility in question:

Carrier: Great American
Term: January 1, 1980 to December 31, 1980
Policy #: SLP 9436336
Limits: 1\$ million combined single limits

6. None known.

Our Certification of these answers is attached. Please let us know if we can be of further assistance.

Very truly yours



Mark A. Russell
Staff Attorney

cc: Marc Seidenberg, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 17th Floor
New York, NY 10007

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATIONState of GeorgiaCounty of Gwinnett

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Mark A. Russell

NAME (print or type)

Staff Attorney

TITLE (print or type)

Mark Russell

SIGNATURE

Sworn to me before this

30th day of October , 1995

Cynthia A. Jordan
Notary Public

NOTICES:

Alumax Inc.
c/o Mark A. Russell
5655 Peachtree Parkway
Norcross, GA 30092-2812
770/246-6658
770/246-6660 (FAX)

Notary Public, Gwinnett County, Georgia
My Commission Expires September 8, 1998

OCT 06 '95 10:55

PAGE. 012